

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

*

V.

*

Criminal No. RDB-10-0281

RAINE CURTIS

*

* * * * *

DEFENDANT'S REQUEST FOR RECONSIDERATION OF ORDER OF DETENTION

Now comes the defendant, Raine Curtis, by and through Joseph Murtha, Esquire, and Miller Murtha & Psoras, LLC, and pursuant to 18 U.S.C. §3145(b) respectfully requests that this Honorable Court reconsider the Order of Detention entered by the magistrate judge, and previously affirmed by this Court.

The defendant avers that there are conditions which can be imposed upon the defendant which will reasonably assure the appearance of the defendant and will assure that the defendant will not endanger the safety of any other person or the community.

Respectfully submitted,

/s/

Joseph Murtha
Federal Bar No. 23725
Miller Murtha & Psoras, LLC
1301 York Road, Suite 200
Lutherville, Md. 21093
(410) 583-6969

Attorney for the defendant
Raine Curtis

REQUEST FOR A HEARING

Pursuant to 18 U.S.C. §3145(b) the defendant requests that he be provided a promptly scheduled hearing of his request for review of the order of detention.

_____/s/
Joseph Murtha

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of December, 2010, a copy of the foregoing Defendant's Request for Reconsideration of Order of Detention was sent by electronic transmission to John F. Purcell, (Jack.Purcell@usdoj.gov) Assistant United States Attorney, Office of the United States Attorney for the District of Maryland, 36 S. Charles Street, Suite 400, Baltimore, Maryland 21201.

_____/s/
Joseph Murtha

JM9784

